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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RH KIDS, LLC, a California limited liability
company,

Plaintiff,

vs.

QUALITY LOAN SERVICING
CORPORATION, a California corporation
registered with the Nevada Secretary of State;
LAKEVIEW LOAN SERVICING, LLC, a
National banking association; NEVADA
LEGAL NEWS, LLC, a Nevada limited liability
company; DOES I through X and ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:22-CV-00297-APG-EJY

**STIPULATION AND ORDER TO STAY
DISCOVERY AND CONTINUE ALL
DEADLINES INCLUDING RULE 26(f)
CONFERENCE AND DEADLINE TO
SUBMIT STIPULATED DISCOVERY
PLAN AND SCHEDULING ORDER**

Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rules LR 6-1 and 26-1, the undersigned parties hereby stipulate and agree to the submission of the Stipulated Discovery Plan and Scheduling Order as set forth more fully below.

1. On May 20, 2022, counsel for Plaintiff and counsel for Defendant, LAKEVIEW LOAN SERVICING, LLC (Defendant), conducted the Rule 26(f) conference.

2. Although Plaintiff's counsel and counsel for Defendant agreed as to the contents of a proposed Stipulated Discovery Plan and Scheduling Order, Plaintiff's counsel and counsel for Defendant agreed to a stay of this matter, including a stay of all discovery, pending resolution of the *sub judice* Motion to Remand the Case to State Court [ECF No. 12] and the outcome of those motions may either result in the dismissal of remand of this action or may considerably alter the scope of discovery.

1 3. For different reasons, Defendants, QUALITY LOAN SERVICING CORPORATION and
2 NEVADA LEGAL NEWS, LLC, have not filed a responsive pleading or any other response to the
3 Complaint. QUALITY LOAN SERVICING has sought non-monetary status and NEVADA LEGAL
4 NEWS has not yet been served with the Complaint, the acquiescence of those parties to this stipulation
5 is, therefore, unnecessary.

6 4. This matter concerns a foreclosure sale that Defendant noticed on a property owned by
7 Plaintiff. As part of this stipulation, Defendant agrees not to move forward with the foreclosure until
8 the stay on discovery is lifted so long as any claims remain pending after the issuance of the orders on
9 the pending motions.

10 5. Based on the agreement of counsel, the parties hereby stipulate and agree that:

- 11 • all discovery in this matter (including, without limitation, Initial Disclosures, and the
12 Stipulated Discovery Plan and Scheduling Order) is stayed until thirty (30) days after the
13 Court issues orders either granting or denying all of the above-mentioned motions so long
14 as any claims remain pending after the issuance of said orders;
- 15 • any party may seek or oppose a further stay of discovery in this matter;
- 16 • subject to another agreement of the parties or a motion by any of the parties seeking a
17 further stay, the Stipulated Discovery Plan and Scheduling Order shall be due thirty (30)
18 days after the stay expires; and
- 19 • LAKEVIEW LOAN SERVICING, LLC shall not move forward with the foreclosure sale
20 of the subject property until the stay on discovery is lifted so long as any claims remain
21 pending after the issuance of the orders on the pending motions.

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6. The parties enter this stipulation in good faith and not out of a desire to harass or delay the litigation of this action.

IT IS SO AGREED AND STIPULATED.

DATED this 3rd day of June, 2022.

/s/ Matthew P. Pawlowski
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IT IS SO ORDERED.

Rayna L. Zouchak
UNITED STATES MAGISTRATE JUDGE

Dated: June 6, 2022